

infringement, counterfeiting, and unfair competition, as well as an order requiring Defendant to destroy all infringing product, accounting and disgorgement, treble damages, attorney's fees, and pre- and post-interest judgment. *See* (*id.* at 6). Plaintiff and Defendant now stipulate to the entry of this Stipulated Order for Permanent Injunction ("Order") to resolve all matters in this action.

THEREFORE, IT IS ORDERED as follows:

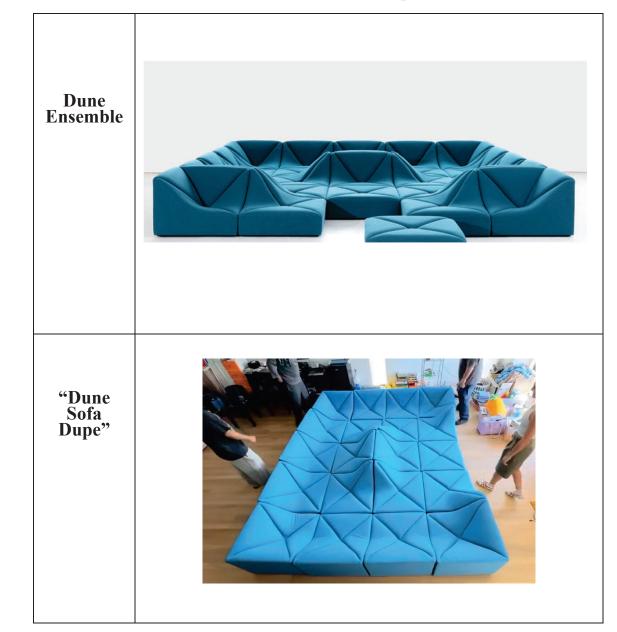
FINDINGS

- A. The Court has jurisdiction over this matter.
- B. The Complaint alleges that Plaintiff is the exclusive producer and seller of the Dune Ensemble, a seating module designed by Pierre Paulin in 1970, as well as other original designs by Mr. Paulin.
- C. The Dune Ensemble is subject to a United States trade dress application (No. 98309041) filed with the United States Patent and Trademark Office. Plaintiff alleges that the Dune Ensemble is instantly recognizable as a Pierre Paulin design, known for its distinct shape, size, and cushion configuration ("Paulin Trade Dress"). Plaintiff also alleges that it has been producing, distributing, and selling the Dune Ensemble and using the Paulin Trade Dress in commerce continuously since 2014.
 - D. Plaintiff alleges that it exclusively markets and sells the Dune Ensemble.
- E. Plaintiff alleges that it discovered an Instagram reel posted by Defendant on September 13, 2024, wherein Defendant shows the delivery and assembly of a "Dune Sofa Dupe" to a client.
- F. Plaintiff alleges that Defendant's "Dune Sofa Dupe" copies Plaintiff's protected trade dress, including the Dune Ensemble's shape, size, and number of cushions, in violation of Plaintiff's intellectual property rights.

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action. See (Stipulation at 1). However, because the parties have not moved to amend the case caption, the caption still reflects GetUrDupe, LLC as the defendant.

G. The "Dune Ensemble" and "Dune Sofa Dupe" are shown below:



- H. Plaintiff filed the Complaint on November 7, 2024, alleging claims for trade dress infringement, false designation of origin, and unfair competition against Defendant.
 - I. The Complaint states a claim and injunctive relief is appropriate.

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DEFINITIONS

For purposes of this Order, "Defendant" shall mean:

A. Defendant.

- B. Defendant's present and former members, officers, directors, employees, beneficiaries, partners, affiliates, representatives, and agents, as well as their respective predecessors, successors, assigns, licensees, heirs, spouses, executors, and administrators.
- C. All those acting in concert or participation with any of the above-individuals and entities.
 - D. All other persons or entities acting under Defendant's control.

ORDER

IT IS THEREFORE ORDERED that Defendant is hereby permanently enjoined from:

- A. Designing, manufacturing, importing, exporting, marketing, advertising, promoting, distributing, shipping, transferring, offering for sale, or selling the "Dune Sofa Dupe" or any other product that incorporates the Paulin Trade Dress, is a colorable imitation of the Paulin Trade Dress, or is confusingly similar to the Paulin Trade Dress.
- B. Using photographs, illustrations, or other depictions of the Paulin Trade Dress, any other product that incorporates the Paulin Trade Dress, any other product that is a colorable imitation of the Paulin Trade Dress, or any other product that is confusingly similar to the Paulin Trade Dress on any commercial website or for any commercial purposes.
 - C. Passing off Defendant's goods and/or services as those of Plaintiff.
- D. Engaging in any other conduct that tends to falsely represent, or that is likely to confuse, mislead, or deceive consumers to believe, that Defendant or its products or services are sponsored, approved, or licensed by Plaintiff, or are in some way connected or affiliated with Plaintiff.

Case	e 2:24-cv-09652-SPG-SSC		Page 5 of 5 Page ID	
1	RETENTION OF JURISDICTION			
2	IT IS FURTHER ORDERED that this Court retains jurisdiction over this			
3	matter for purposes of construction, m	matter for purposes of construction, modification, and enforcement of this Order.		
4	NO I	NO FEES AND COSTS		
5	IT IS FURTHER ORDERED	IT IS FURTHER ORDERED that each party shall bear its own costs and		
6	attorney's fees.			
7		DISMISSAL		
8	IT IS FURTHER ORDERED that, except as provided herein, all claims are			
9	dismissed with prejudice, including any counterclaims by Defendant.			
10	NO APPEAL			
11	Plaintiff and Defendant have ex	Plaintiff and Defendant have expressly waived any and all rights to appeal		
12	this Order.			
13	IT IS SO ORDERED.			
14		le	Sec. 1997	
15	DATED: October 24,2025	1875		
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